

Richard M. Heimann (State Bar No. 63607)
Kelly M. Dermody (State Bar No. 171716)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
Dean Harvey (State Bar No. 250298)
Anne B. Shaver (State Bar No. 255928)
Lisa J. Cisneros (State Bar No. 251473)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008

Joseph R. Saveri (State Bar No. 130064)
James Dallal (State Bar No. 277826)
JOSEPH SAVERI LAW FIRM, INC.
505 Montgomery, Suite 625
San Francisco, CA 94111
Telephone: 415.500.6800
Facsimile: 415.395.9940

Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

CLASS ACTION

**DECLARATION OF ANNE B. SHAVER IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENTS**

1 I, Anne B. Shaver, declare:

2 1. I am an attorney licensed to practice in the Northern District of California. I am an
3 attorney at the firm of Lieff Cabraser Heimann & Bernstein, LLP (“LCHB”), Co-Lead Counsel
4 for the Class Representatives and the Class. I have personal knowledge of the facts set forth
5 herein and could competently testify to them if called as a witness.

6 2. The Claims Administrator, Heffler Claims Group (“Heffler”), has informed me
7 that five Class members have filed an objection to the Settlements.

8 3. A true and correct copy of the objection of Class member Eric Grosse is attached
9 hereto as Exhibit 1.

10 4. A true and correct copy of the objection of Class member Emma Merrell is
11 attached hereto as Exhibit 2.

12 5. A true and correct copy of the objection of Class member Tom Sanocki is attached
13 hereto as Exhibit 3.

14 6. A true and correct copy of the objection of Class member Jeffrey Brown is
15 attached hereto as Exhibit 4.

16 7. A true and correct copy of the objection of Class member Conrad Minshall is
17 attached hereto as Exhibit 5.

18 8. Heffler has also informed me that 10,634 members of the Settlement Class have
19 filed claim forms, and that 167 members of the Settlement Class have opted out of the
20 Settlements.

21 9. Since the notice was mailed, LCHB has been contacted by over fifty (50) Class
22 members with questions regarding the Settlements. We have answered their questions to the best
23 of our ability, and referred them to Heffler where appropriate.

24 I declare under penalty of perjury under the laws of the United States and the State of
25 California that the foregoing is true and correct to the best of my knowledge and that this
26 declaration was executed in San Francisco, California on April 10, 2014.

27 /s/ Anne B. Shaver
28 Anne B. Shaver